

EXHIBIT A

DECLARATION OF DAVID L. JOHNSON

1. I am a partner with Butler Snow, LLP and have served as counsel for Plaintiff Consolidated Industries, LLC d/b/a Weather King Portable Buildings (“Weather King”) in this case.

2. In response to Weather King’s written discovery (including after the Court’s August 29, 2023 Order (ECF No. 111)), none of the Defendants produced any text messages, and Weather King did not obtain text messages from their devices until Repario obtained the text messages as part of the Court-ordered forensic examination.

3. Although Ryan Brown is the only Defendant who produced email correspondence in response to Weather King’s written discovery, he only produced one email in the February-May 2022 time period, and most of the produced emails were in the 2020-2021 time period.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.



David L. Johnson

Date: July 22, 2025